

MORRIS LAW CENTER
BRIAN A. MORRIS, ESQ.
Nevada Bar No. 11217
brian@morrislawcenter.com
5450 W. Sahara Ave., Suite 330
Las Vegas, NV 89146
Telephone: (702) 850-7798
Facsimile: (702) 850-7998
Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRACY R. MITCHUSSON, Trustee of the
Tracy R. Mitchusson Trust dated
11/24/1999;

Case No.: 2:19-cv-00585-APG-BNW

Plaintiff,

vs.

MTC FINANCIAL INC. d/b/a TRUSTEE
CORPS; BANK OF NEW YORK MELLON;
and BAYVIEW LOAN SERVICING, LLC;

Defendants.

STIPULATION AND ORDER TO EXTEND DEADLINES

Plaintiff; Tracy R. Mitchusson, Trustee of the Tracy R. Mitchusson Trust dated 11/24/1999 ("Plaintiff"); by and through her attorney of record, Brian A. Morris, Esq of Morris Law Center and Defendants; MTC Financial Inc. d/b/a Trustee Corps, Bank of New York Mellon, and Bayview Loan Servicing, LLC ("Defendants"); by and through their attorney of record Natalie L. Winslow, Esq. and Rex D. Garner, Esq. of Akerman LLP hereby stipulate and agree to an extension of time for Plaintiff to file her reply in support of motions (EFC No. 54 and 55), and response in opposition to motion (EFC No. 58) (First Request).

...



1 **I. RELEVANT PROCEDURAL BACKGROUND**

- 2 1. Plaintiff filed a Motion to Invalidate Settlement Agreement for Lack of Standing
3 and Motion to Stay Proceedings on February 11, 2020 (EFC No. 54 and 55,
4 respectively).
- 5 2. Defendants filed their response in opposition to Plaintiff's motions on February
6 25, 2020 (EFC No. 57).
- 7 3. Plaintiff's reply in support of EFC No. 54 and 55 was due on March 3, 2020.
- 8 4. Defendants filed a Counter Motion to Enforce Settlement, or in the Alternative,
9 Motion for Summary Judgment on February 25, 2020 as EFC NO. 58.
- 10 5. Plaintiff's response in opposition to Defendant's Counter Motion or Motion for
11 Summary Judgement was due on March 10, 2020.

12 **II. REASON FOR REQUEST FOR STAY**

13 Plaintiff recently obtained legal counsel, and was previously pro se. In light of
14 this development, the parties agree to extend Plaintiff's deadline to reply in support of
15 her motions and respond to Defendant's countermotion to May 1, 2020, in order to
16 facilitate settlement discussions and to give Plaintiff's counsel time to formulate a
17 response. The parties make this request in good faith and not for the purpose of delay.

18 ...

19 ...

20 ...

Mitchusson vs. MTC Financial Inc. et al

Case No: 2:19-cv-00585-APG-BNW

1 **IT IS STIPULATED AND AGREED** that Plaintiff's deadline to file a reply in
2 support of her Motion to Invalidate Settlement Agreement and To Stay Proceedings is
3 extended to May 1, 2020.

4 **IT IS FURTHER STIPULATED AND AGREED** that Plaintiff's deadline to file
5 a response in opposition to Defendant's Counter Motion to Enforce Settlement, or in the
6 Alternative, Motion for Summary Judgment, is extended to May 1, 2020.

7
8 Dated: 4/15/2020

Dated: 4/15/2020

9 MORRIS LAW CENTER

AKERMAN LLP

10
11 By: 

12 Brian A. Morris, Esq.
13 Nevada Bar No. 11217
14 *Attorney for Plaintiff*

By: /s/ Rex D. Garner

Natalie L. Winslow, Esq.
Nevada Bar No. 12125
Rex D. Garner, Esq.
Nevada Bar No. 9401
Attorneys for Defendants

15
16 **ORDER**

17 **IT IS SO ORDERED.**

18 DATED: April 16, 2020.

19
20 
21 **UNITED STATES MAGISTRATE JUDGE**